

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
DOCKET NO. 3:24-cv-00440

KELLY MILLIGAN et al.)
Plaintiff,)
vs.) MOTION FOR ADMISSION
MERRILL LYNCH et al.) *PRO HAC VICE*
Defendant.) and AFFIDAVIT
)

NOW COMES John D. Hurst (“Local Counsel”), a member in good standing with the Bar with the United States District Court for the Western District of North Carolina (“WDNC”), and moves for the admission of Seth R. Klein (“Applicant”), who seeks permission to represent Kelly Milligan, on behalf of himself and all others similarly situated,

_____) (“Client”) in this above-captioned case.

By signing this motion, Local Counsel and Applicant certify that:

1. Applicant is a member in good standing of the bar of the highest court of the State or of the District of Columbia where Applicant regularly practices law, which is Connecticut.

2. Applicant practices under the name of or as a member of the following firm:

Firm Name: Izard, Kindall & Raabe LLP

Mailing Address: 29 South Main Street, Suite 305

City / State / Zip: West Hartford, CT 06107

Telephone Number: (860) 493-6292 **Facsimile Number:** (860) 493-6290

Email Address (required): sklein@ikrlaw.com

3. Applicant certifies that s/he is also admitted to practice before and remains in good standing with the Courts in the following jurisdictions:

State of Connecticut, District of Columbia, U.S. District Court for the District of Connecticut, and Court of Appeals for the 2nd Circuit

4. Applicant certifies s/he has never been the subject of any formal suspension or disbarment proceedings; never been denied admission *pro hac vice* in this or any other jurisdiction or had *pro hac vice* admission revoked; never had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked; and has never received public discipline by any court or lawyer regulatory organization. If Applicant cannot so certify, the applicant has attached a separate explanation including particular information disclosing the disciplinary history or the denial of admission.

5. Applicant certifies that the client requested Applicant to represent it in this matter, along with Local Counsel.

6. Applicant agrees to be subject to the Orders of the WDNC, including the Local Rules of the WDNC, and amenable to the disciplinary action and the civil jurisdiction of the WDNC in all respects as if the applicant were a regularly admitted and licensed member of the Bar of this Court in good standing.

7. Local Counsel is satisfied that Applicant is qualified to practice before the Bar of the WDNC.

8. Local Counsel has conferred with counsel for the other parties, who have indicated they *do not* oppose this motion.

9. The required fee for admission *pro hac vice* is being submitted with the filing of this motion.

10. Applicant consents to electronic notification.

By signing this Motion, we so certify.

This, the 16th day of September, 2024.

/s/ John D. Hurst

Local Counsel

Attorney Name John D. Hurst

Bar Number N.C. Bar No. 37680

Firm Name MOTLEY RICE LLC

Firm Address 50 Clay Street, Suite 1

Firm City / State / Zip Morgantown, WV 26501

Telephone Number (304) 413-0456

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/s/ Seth R. Klein

Applicant